

Appendix C. Staff Interview Questions



We have assembled some staff interview questions to help reviewers target problem areas during a program review. The interviewing process is important because it can identify problems and systemic deficiencies not readily apparent in a file review alone. They are not intended to be all inclusive as there are many different questions reviewers may ask, and the interview process will differ based upon the type of institution that is being reviewed. Some institutions may have a number of persons working in many different departments, while smaller institutions may administer most of their Title IV work through the financial aid office. **Reviewers must use their professional judgement in the type of questions being asked, and expand or focus the questioning when necessary to follow up on areas of concern disclosed by the answers to other questions.**

As noted in Chapter 3, reviewers should usually begin by asking general, open questions (e.g., explain the admission process). However, this appendix lists many more specific questions to highlight some areas that reviewers might want to make sure that the staff touched on in their general discussions.

Not listed below is the final question that reviewers should consider asking everyone that they interview – “Is there anything else that you think I need to know about the way this school administers the Title IV programs?” Many people don’t feel comfortable volunteering information about possible irregularities they have observed, but may be prompted to discuss them if asked such a question.

All interviews must be completely documented for future reference.

ACADEMIC OR EDUCATION PERSONNEL/REGISTRAR QUESTIONS

Name

Position/Title

Award years in position

Date/Time of Interview

(Ask them to show attendance documents and explain codes and how records are kept. Request policies and procedures manual & other documents, as needed. Keep track of any additional documents requested.)

The following questions are suggested for this interview process:

- Describe your job duties.
- Describe the institution's programs in terms of their length (months, weeks, units/hours, & hours per week).
- Are all of your courses accredited and licensed?
- How is your academic year defined?
- How and when is it enforced?
- Explain registration/enrollment process. How/when do students register for term, how far into term can students drop/add classes; when is enrollment finalized for term?
- How does school verify who actually enrolled for registered classes?

ATTENDANCE ISSUES:

- Does your accrediting agency require that you take attendance?
- How is attendance taken? Who takes it/how often? Are there sign-in sheets/instructor checks off roster? Do you note who is present or who is absent? Is partial attendance recorded (arrived late/left early), and in what increments (quarter/half hours, etc.)?
- How are attendance records maintained?
- What is the school's attendance policy? Are students dropped after a number of absences? If so, what number is that?
- Who makes the final decisions regarding terminations for attendance problems (if applicable)?
- Are exceptions documented?
- Does the attendance policy or attendance probation (if applicable) relate to financial aid?
- Are excused absences allowed? How much or what percentage?
- Are students allowed to make-up absences? If so, explain policy & process.
- How is make-up instruction given (instruction by teachers/self-directed assignments/homework?)
- How are make-up hours documented?

- For programs without academic terms, how is the midpoint determined (different programs)?
- Discuss SAP Process – what is policy & which office makes determinations? (Detailed SAP questions at end of this appendix).
- Are there any other sites or locations in which instruction is given?
- What is the school's LOA policy? What procedures are followed to grant an LOA?
- How does the school determine the last day of attendance for unofficial withdrawals?
- How/when are no-show's identified?
- How are the appropriate offices notified of student's withdrawal, and last date of attendance (LDA)?

ACADEMIC OR EDUCATION PERSONNEL/REGISTRAR QUESTIONS (CONTINUED)

- Are students charged for exceeding their contracted hours? (clock hour schools)
- What information do you share and coordinate with the financial aid office?
- Do you maintain a separate academic file for each student?
- Is there any special designation for students who are not eligible to apply for Title IV (e.g. foreign, non-matriculated) on student data bases?
- Are there any consortium agreements or contracts with other schools?
- What is the school's clock-to-credit hour conversion ratio? (if applicable)
- For re-enrolling students, do they apply through admissions? If not, which office handles, and are there any payment incentives for number of students re-enrolled?
- Does school have externships as required part of programs? For which programs?
- If the school has externships, who coordinates the process? Describe the process (detailed questions for externship process at end of this appendix).
- Who is responsible for completing SSCRs and reporting student status changes on NSLDS? Explain process. Who actually does input, do they have their own User ID/passwords? (Depending on school, this process may be handled by FAO.)

ADMISSIONS PERSONNEL INTERVIEW QUESTIONS

Name

Position/Title

Award years in position

Date/Time of Interview

(Ask them to show you the forms associated with the admissions process from an actual file. Request policies and procedures manual & other documents during the interview. Keep track of any additional documents requested.)

The following questions are suggested for this interview process:

- Describe the admissions process: If I am a student interested in going to school, how do I find out about your school? Then what happens?
- How are students recruited? Are any staff given compensation based on success in securing enrollment?
- Describe programs in terms of their length (months, weeks, units/hours).
- Could you give us an idea of what types of students typically enroll in your programs? (population characteristics such as H.S. graduate, age, gender, U.S. citizens or not, Aid to Families with Dependent Children (AFDC) recipients, JTPA, vocational rehabilitation, transfers, restarts, etc.)
- If students are enrolling in ESL courses and their English is poor, how do you help them fill out forms which are written in English? Who helps with Financial Aid forms?
- If students re-enroll after dropout, do they apply through admissions? If not, where do they go?

ABILITY-TO-BENEFIT

1. What ATB test used/are there multiple versions?
2. Does the licensing/accrediting bodies specific which ATB tests are approved?
3. How many parts are there for the ATB test and are all parts administered?
4. Different passing scores for different programs?
5. Retake policy?
6. Describe the testing process (how often is test given, is test timed?, etc)
7. Who administers the ATB test? (one or more?)
8. How is that person paid? (need copies of pay documentation and contracts)
9. If degree-granting school (or public vocational school), is the testing center independent of admissions/financial aid – and meet other requirements at 668.142?
10. For any other types of schools, do admissions representatives or any school employee ever administer ATB tests?
11. How does the independent tester report test results?
12. Do the admissions representatives have access to test questions and answers?
13. Are students ever counseled in strategies for passing the test/are students given practice tests?
14. What GED program is available for ATB students?

(SEE THE INDEPENDENT ATB ADMINISTRATOR QUESTIONS)

- Does the school admit students who fail to meet ATB requirements? If so, how are they flagged as non-Title IV eligible?
- Are there special admissions requirements for certain programs?
- Please describe the programs - length, clock or credit hours, etc. & tuition and fees.
- What sort of consumer information is given to students prior to enrollment?
- When do students register in relation to their program's start date?
- How long after classes start are students allowed to register and begin attending?
- How frequently do class starts occur (different programs)?
- What is the school's enrollment? _____ Percentage on financial aid? _____ %?
- What hours/days do the students attend school? (part and full-time)
- Are there any other locations besides this location in which students are taught?
- At what point would a prospective student find out about financial aid?
- What financial aid information do admissions reps give?
- What coordination of information occurs between admissions and financial aid?
- Is admissions data entered onto any integrated computerized database?
- Describe any remedial programs.
- Is there a maximum number of remedial classes a student can take? If not, check if financial aid office has a way to ensure that Title IV funds are paid for a maximum 1 year of remedial courses.
- For students enrolled in ESL-only programs, how are pre-existing job skills documented?
- Are any high school students admitted into the program?
- Do accrediting/licensing agencies require documenting HS grad (diploma or transcript)?
- Who verifies high school graduation for students who applied prior to finishing high school, and how is this accomplished?
- Is a separate admissions file kept on each student?

INDEPENDENT ATB ADMINISTRATOR QUESTIONS

Name

Position/Title

Award years in position

Date/Time of Interview

This is a compilation of suggested questions for the independent test administrator. This is not a script of questions you must ask; it is only a guide of some issues you may want to address with the tester. Many of these questions address procedures (such as verifying students' ID's) that are not required by ED. However, the answers you get may provide some insight into the school's ATB process.

- Did you have any previous testing background before working for this school?
- How did you come to work for this school?
- Describe any prior affiliations or relationships with any officers of the school.
- Do you have a written contract with the school? Please provide a copy.
- What test is used? Are there multiple versions?
- Describe the Test Developer's requirements. (e.g., whether test is timed, whether different versions of tests should be used for retest, number of times student can retake test, whether practice test are appropriate).
- Who decided which test should be used?
- Explain the ATB testing process at the school.
- Are students given a practice test?
- Is the complete test given?
- Explain any procedures you may have for checking the identity of individuals taking the test (make sure "ringers" aren't being sent in to take the test).
- Explain the testing procedures. Is the test constantly monitored? What happens if you must leave the room while the test is going on?
- Are students charged for the test?
- What is the passing score(s) for the test? Is this based on the test developer's standards (and ED's criteria), or did the school determine the passing score?
- Some tests allow the tester to add or subtract points from the students' scores based on circumstances (e.g., age, test environment). What, if any, adjustments do you make?
- How is the school notified of the students' test results?
- Do you keep an independent record of who was tested and the scores for each student? If so, please give us a copy.

- Have you had any cases of students cheating on the test (e.g., copying from other students)?
- What did/would you do in such a case? Is there an agreed-upon procedure with the school?
- Have you ever had cases where you found students who had the test answers (crib sheets)? If so, how did the students get the answers?
- Have students ever mentioned receiving counseling to help them pass the test?
- Does school personnel have access to the test answers?
- Describe any procedures or guidelines for invalidating students' test scores? (Some large testing companies have procedures for monitoring retests, and call for invalidating test results if students score significantly higher on retest.)
- Have you met the requirements of the test publisher to be a test administrator?

FINANCIAL AID PERSONNEL INTERVIEW QUESTIONS

Name

Position/Title

Award years in position

Date/Time of Interview

(Ask them to show forms used from an actual student's file. Request policies and procedures manual. Keep track of any additional documents requested.)

The following questions are suggested for this interview process:

- Describe the general responsibilities in Title IV administration and functions of different employees in the financial aid office (FAO): Please describe the financial aid process chronologically.
- What has to happen in order for students to get financial aid once they decide to go to your school?
- Describe process before aid is disbursed: application for financial aid, needs analysis, budget determination, award letters, receipt of ISIRs, student signatures, loan counseling, etc.
- Describe verification policies and procedures. (Check for written policies and procedures)
- Describe computer databases used in office. How is ISIR data maintained/need analysis calculation documented/maintained? Do they track document receipt, are they used for authorizing awards for disbursement?
- How does the database identify ISIR issues, such as student eligibility ("C" codes) and NSLDS flags?
- What is the role of the servicer (if applicable)?
- How does the school define its academic year and payment periods for financial aid purposes?
- How are costs of attendance (COAs) constructed?
- What is the school's campus-based awarding philosophy? How is aid packaged?
- Which students receive FSEOG? (Pell eligible, lowest FC?)
- Does the institution award financial aid for indirect living expenses?
- Discuss professional judgement process/criteria.
- Is backup documentation maintained for students listed on the FISAP income grid? (May be with the fiscal officer, depending on who completes the FISAP)
- Who is responsible for completing SSCRs and reporting student status changes on NSLDS? Explain process. Who actually does input, do they have their own User ID/passwords? (Depending on school, this process may be handled by registrar)
- How does the FAO communicate or receive information from other offices such as admissions, academic or education department, placement, etc.?
- How are files kept? (academic, admissions, attendance, financial aid, placement?) Request that the financial aid officer walk through a student's file with you to become familiar with their forms.

- Discuss SAP Process – what is policy & which office makes determinations? (Detailed SAP questions at end of this appendix).
- How is the FAO notified if the student is not making SAP?

AUTHORIZING TITLE IV DISBURSEMENTS

- Describe the process for authorizing disbursement of Title IV funds.
- How do you track who has met all requirements for disbursement, and how is that reported to the bursar/fiscal office?
- When does the school begin disbursing funds for a term (10 days before, after registration, after drop/add)? Who controls timing of subsequent disbursements – FAO or bursar?
- Who is responsible for verifying students' eligibility for disbursements made on expected enrollment status (e.g., if funds disbursed 10 days prior to start of term, who verifies that student actually enrolled in classes to justify payments made)?
- Who is responsible for monitoring that students are not overawarded?
- Describe FAOs role with FFEL check receipt/disbursement procedures. If FAO receives checks, do they keep log of receipt date?
- Does financial aid disbursement differ for students in different programs?
- What is the process when a student's award needs to be revised (upward or downward)?

RETURN TO TITLE IV FUNDS (REFUNDS)

- Explain FAO's role in the school's refund procedures.
- How is your office notified when a student has withdrawn?
- Who completes the refund calculations? If FAO, how is business office/bursar notified of refund amount?
- What is process for monitoring whether students pay their share of refunds under the new provisions?

FEDERAL FAMILY EDUCATION LOAN (FFEL) PROGRAMS

- Are specific people responsible for certifying FFEL loans?
- What is the criteria for certifying Unsub Loans instead of PLUS for dependent students?
- How is the COA and EFC determined for non-standard loan periods (different programs)?
- Are loan amounts prorated?
- What loan counseling is done and when? Is in-person exit counseling done before graduation?

FEDERAL PERKINS LOAN PROGRAM

- Where are Perkins promissory notes stored (should be in a fire-proof, locked cabinet)?
- When do students sign schedule of advances?
- Explain how entrance and exit counseling is conducted for Perkins loan recipients?
- Are repayment schedules given to students? Does the institution maintain a copy of the - repayment schedule with the promissory note after the student leaves?

FEDERAL WORK-STUDY PROGRAM

- What types of FWS jobs do you have (if applicable, see off-campus agreements)? (Gather the job descriptions)
- How are the hours the students worked monitored by a supervisor? (signed timesheets)
- How are earnings monitored to ensure that the award was not exceeded?
- What is the rate students are paid? (cannot be less than the minimum wage)
- How long do the students work per week? (must be part-time employment)
- Is there a limit to the number of hours students can work per pay period/week? If so, what happens if student exceeds that limit?
- Are there any policies regarding how long a student can work/break times?
- How does school monitor percentage of funds allocated for community service?
- Who decides if funds are carry forward/back – FAO or Fiscal Office?

FEDERAL DIRECT LOAN PROGRAM

Explain the Direct Loan process and identify the individual(s)/office(s) responsible for various components of the process.

- Who creates the loan origination records?
- What office is responsible for printing the promissory notes?
- At what level of functionality does your school process MPNs? Multi-year or single year?
- Does your school use the new E-Sign process?

- Who transmits data to the LOC?
- Who is responsible for Direct Loan cash management activities?
- Who is responsible for ensuring that the school's loan information matches all LOC records?
- Who requests funds (Option 2 schools only)?

- What are the roles of financial aid, business/comptroller's office, registrar, etc.?

- How does your institution determine who will receive a Direct Loan?

- What type of system environment is your school using to manage Direct Loans-- PC using EExpress, PC using custom or third party software, combination of Mainframe and PC, or Custom/ Mainframe?

- How does the institution enter data elements into the Direct Loan system? Are they manually entered from other documents, or are they uploaded from another system?

- Who is authorized to make changes to data in the system?

- Does the institution have a Quality Assurance component? Explain what your institution does in reference to the Direct Loan Quality Assurance requirement. Is your school in the Quality Assurance Program (QAP)?

Note: The Quality Assurance Program is different from the QA component of the Direct Loan Program.

-How frequently does the institution perform reconciliation? How are Direct Loan reconciliation discrepancies or problems resolved at your institution?

-How does the school request Direct Loan funds? Does the financial aid office provide a list of eligible students for whom funds are being requested to the business/comptroller's office? How does the person who completes the drawdown determine the amount of cash to request?

-How does the school ensure that disbursements are reported to the LOC within the 30-day timeframe?

-Describe the school's process for making refunds to the Direct Loan program.

-Describe how entrance/exit counseling is done at your school?

-How many Federal bank accounts does the school maintain? Into which account are Direct Loan funds deposited?

-Are student credit balances ever maintained on a student's account? If so, has the student signed an authorization form? When does the school provide a credit balance to a student?

DEFAULT MANAGEMENT PLAN

(NOTE: see the Default Management Checklist – Appendix H)

-What are the default rates? Is the school appealing the calculation of the rates?

-If the rates are high, has the institution submitted a default management plan to ED?

-How does financial aid office coordinate with other offices to reduce defaults? Their roles?

FISCAL INTERVIEW QUESTIONS

Name

Position/Title

Award years in position

Date/Time of Interview

General responsibilities as it relates to fiscal or business aspects of Title IV program administration. Keep track of any additional documents requested.

The following questions are suggested for this interview process:

- What is the role of the corporate office (if applicable) in the fiscal area? (separate OPEID's, TIN's, DUNS?)
- Who requests the drawdowns?
- What information do you receive from the financial aid office?
- What is the basis you use for drawing down funds -- explain process. (Cash management plan/cash flow projections -- how do you determine how much cash to draw down?)

FEDERAL BANK ACCOUNTS

- How many federal bank accounts does the school maintain? Into which account are the federal funds deposited?
- Are the federal bank accounts regularly reconciled? How often?
- Are the bank accounts interest bearing? If so, is interest (other than for a Federal Perkins Loan fund) returned to ED?
- Has the interest been returned through GAPSWEB?
- How are the accounts identified at the bank (with word "Federal")?
- Are there any bank service or other charges on the Federal accounts? If so, how reimbursed?
- Who does the bank reconciliation between the ledgers and bank statements?
- Does the school maintain a separate Perkins Loan Account?

GENERAL

- When are FSEOG, Perkins, and FWS matches made? How are they calculated?
- Does the institution ever have excess cash on hand? If so, why?
- Has your institution utilized all its allocated funds? If not, why?
- How does the school reconcile Pell authorizations (in RFMS) with drawdowns/disbursements (in GAPS)
- Does the institution keep a separate Title IV account, ledger, and chart of accounts?
- Who keeps the general ledger and/or Title IV ledger/journal?
- Who does the reporting on the RFMS Summaries and FISAP to ED?
- From what campus-based program does the institution take its administrative cost allowance (ACA)? (see institution's FISAP) How is the ACA calculated? (if applicable)
- Who does the account reconciliation with the RFMS, FISAP, EDCAPS, and ledgers? How often? Explain process.
- What are the procedures for monitoring outstanding checks (excess Title IV funds sent to students)?
- How are FWS funds delivered to students? (checks to student, credited to accounts?)
- Discuss Perkins due diligence procedures (do they use servicer?).

STUDENT DISBURSEMENT PROCESS

- How is bursar notified when to disburse funds for students?
- Which office is responsible for verifying student's eligibility (e.g., SAP, enrollment status, number of clock hours completed) before making subsequent disbursements?
- How and when are disbursements made to students? (after how many units/hours?) How are students notified that their checks have arrived?
- If disbursement process is automated, what checks are in place to prevent double disbursements? (e.g., FAO adjusts award to increase – how does system know to only disburse increased award amount)?
- Are student credit balances ever maintained on a student's account? Under what circumstances?

FFEL DISBURSEMENT ISSUES

- How are FFEL funds received at the institution (individual checks, master checks, wire transfer)? If checks received via master check or wire transfer (EFT), explain process for notifying students/parents of loan disbursements per 668.165.
- Do you keep a FFEL check log or some other method for recording the date the institution: received the FFEL checks from the lender, the date the institution releases the check to the student, the date a loan disbursement check is returned to the lender, and the date a refund is made? (If so, ask for a copy of this.)
- How does the financial aid office inform the business office when to pay checks or hold FFEL disbursements?
- For what reasons would a loan disbursement be held?
- Are all check negotiations documented? Does the school ever just endorse the check and release it to the student (for co-payable checks)?
- How is information about financial aid received from sources other than Title IV (scholarships, JTPA, and employer tuition remission) coordinated with the financial aid office?
- Are there any current Title IV funding or reconciliation discrepancies or problems that we should know about?

RETURN TO TITLE IV (REFUNDS)

- Explain bursar/fiscal office's role in the school's refund procedures.
- How is your office notified when a student has withdrawn?
- Who completes the refund calculations? Who prepares/endorses the refund check?
- Explain the process for arranging for students to pay their share of refunds under new provisions?
- Where are the canceled refund checks maintained?
- What are the refund deadlines and when are refunds calculated/made?
- Is the financial aid office notified of refund amounts (to adjust its records)?
- Do refund checks go through any type of approval process before they are sent to the lender?
- Does the institution delay the date it releases the loan proceeds for first time students?

PLACEMENT OFFICER INTERVIEW QUESTIONS

Name

Position/Title

Award years in position

Date/Time of Interview

(Ask them to show forms associated with placement process. Request policies and procedures manual & other documents. Keep track of any additional documents requested.)

The following questions are suggested for this interview process:

- Describe your job responsibilities.
- Do all students receive placement assistance? When?
- How do you know which students are ready to receive placement assistance?
- Does the school have placement waivers?
- Do students receive instruction in interviewing, resumes, or career development?
- What is the placement rate (different programs)?
- How is this rate determined?
- Are these rates published and made available to students?
- What are the placement procedures?
- How are placement contacts established?
- Does the institution have a professional advisory council or committee?
- Are there any branch campuses or other locations in which students receive instruction?
- What sort of reports does the institution prepare for the accrediting agency or state licensing agency regarding placement?
- Is there a separate placement file?
- If the school has externships, who coordinates the process? Describe the process (detailed questions for externship process at end of this appendix).

- For High Default Schools – are you aware of the placement office’s responsibilities in the institution's default management plan?
- Does the school communicate with its accrediting agency about improvements to its job placement rate?

SATISFACTORY ACADEMIC PROGRESS (SAP) POLICY

The responsibility for administering the SAP policy varies between schools, but usually it is either the financial aid or academic office.

- Describe the SAP policy, including qualitative/quantitative measures, and maximum timeframes.
- What is the school's attendance policy as it relates to financial aid?
- How often is SAP checked/verified (for different programs)?
- At what point does a student lose Title IV eligibility? How can they re-establish eligibility?
- Is there a probationary period? Do students get financial aid on probation?
- What are the appeals procedures for mitigating circumstances?
- What is the school's policy on class repeats and remedial courses?
- Has the school verified that its SAP policy is consistent with requirements of its accrediting and licensing bodies?

EXTERNSHIP PROCESS

The responsibility for administering externships varies between schools, but usually it is either the academic or placement office.

- Who is responsible for coordinating this process?
- How are externship sites chosen by school, are there contractual agreements with all sites?
- How are students chosen for externship (are they assigned/do they apply to the site)?
- Are externships paid/unpaid/both?
- If paid externship, are students considered employees of externship site?
- How is student's eligibility monitored (SAP/attendance)
- How are externship grades determined/used?
- When do externships occur? If all at end of program, do students graduate and /or receive certificate before externship begins?
- Is there a procedure for students if they have problems with externship sites (e.g., work not related to program)?
- Can a student choose not to participate in an externship and substitute additional classes instead?
- Does the school ever waive an externship without having the student take any other classes?